

Bureau of Reclamation
Comments on OIG Audit Draft
Year 2000 Readiness of Automated Information Systems
(Assignment No. A-IN-BOR-110-98R)

General Comments

Results of Evaluation

All known systems were reported in the comprehensive plan sent to The Department of the Interior (DOI), June 1, 1997. Estimated completion dates have proven accurate with less than 5 percent in error. We felt contingency plans were adequate. Reclamation has had, for many years, complex Continuity of Operations Plans (COOP) for all of our facilities. The draft implied the COOP's did not address all of the specific and widespread contingencies that potentially may occur as a result of the Y2K problem even though each facility is prepared for any potential disaster, including Y2K calamities. Reclamation is currently in the process of developing a "Y2K Contingency Planning and Management Guide for Power and Water Facilities" which should cover any anticipated shortfalls.

Automated Information Systems Inventory

At the time of the inventory, no definition for mission-critical systems was available from DOI. Reclamation used a combination of definitions found from the Department of the Air Force Y2K's criteria with a semblance of the actual missions of our Bureau. Reclamation did in fact initially report more mission critical systems in an attempt to fully recognize all Y2K issues. However, as a result of discussions with, and as directed by the Office of Information Resources Management (OIRM), Reclamation reduced the number to 16. These are mission-critical systems that are to be repaired. Based on this guidance, and as a result of guidance from OIRM, Reclamation did not report mission-critical applications that were not Y2K compliant and were scheduled to be retired or replaced.

Reclamation does, however, recognize the concern expressed by the OIG with respect to ensuring that all mission-critical applications are addressed. In fact, we are cognizant of the need to ensure that these applications will continue to function after January 1, 2000, and are providing high-level, ongoing management attention ensuring that all of our mission-critical applications will be Y2K compliant in sufficient time prior to January 2000.

Contingency Planning

Reference was made that nowhere in the facilities COOP's was any consideration made in the event that cellular phones, telephones, radios, and automobiles may fail due to Y2K noncompliance. Reclamation can hardly be held responsible for global and common possibilities outside our scope or ability to control. However, it is the nature of our workforce to be at the work site, or be readily available to transit to the work site at a moment's notice.

Auditable Cost Estimates

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The OIG stated that they did not expect consistent and audible cost estimates at this point, but rather Reclamation should keep track of Y2K expenses from this point forward.

Specific Comments

1. Page 2, leading paragraph, second sentence: Should read March 1, 1999. This is the artificially mandated due date for implementation of all Y2K software applications. All systems with the exception of the Mid-Pacific's CVACS will be Y2K compliant and implemented by March 1, 1999.
2. Page 6, paragraph 1: Since no "special" funding was or is available for Y2K efforts, Y2K costs were and are still taken out of operations and project funds as they currently exist in each office. There have been no means to track, in most instances, Y2K costs.
3. Page 6, paragraph 2, beginning on sentence 3: The actual cost to upgrade the terminal emulator package in EM340 was \$500, and the actual cost to complete the HYDROSS application renovation, including testing and implementation, was \$5,680.
4. Page 7, paragraph 2: We concur that not all Y2K involved personnel had Y2K performance elements in their annual performance plans, including appropriate Reclamation executives. However, since then further direction has been disseminated from the Commissioner's office to assure the Y2K mission critical element has been or soon will be added to all Y2K responsible personnel.
5. Page 8, paragraph 2 under "Contingency Plans": The actual number of noncompliant SCADA systems within Reclamation was two, compared to the numerous SCADA systems found throughout Reclamation. It is believed that 10 power plant operators would more than cover these two SCADA sites. Most operations managers do not expect a need for additional help, since most feel they are already adequately staffed for such an emergency. The original request was Reclamation-wide in nature to cover unforeseen contingencies that may be outside our control.
6. Page 9, paragraph 5: Reclamation had received no IV&V plan guidance from either DOI or OMB at the time of the audit. However, OMB instructions specifying a third party test and direction has been and continues to be given to all Y2K involved personnel and offices throughout Reclamation.
7. Page 9, paragraph 6, compliance reporting: The Y2K compliant SCADA system has been implemented at the Wyoming Area Office and is still running. The system did, however, show non-fatal errors relating to the four digit year just introduced. These have since been repaired.